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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:

DARRIN R DUNKIN PAMELA D DUNKIN,

DEBTOR.

Case No.: BK-14-13637-JDL Chapter 13

## RESPONSE TO OBJECTION TO CLAIM BY TRUSTEE

Comes now the secured creditor, OCWEN LOAN SERVICING, LLC, AS SERVICER FOR THE BANK OF NEW YORK MELLON F/K/A THE BANK OF NEW YORK, AS TRUSTEE FOR THE HOLDERS OF THE GE-WMC ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2006-1 ("Ocwen Loan Servicing, LLC"), by their attorney, Jim Timberlake, and responds to Objection to Claim Number 7 filed by the Trustee on October 9, 2015:

- 1. Ocwen Loan Servicing, LLC is the holder of a purchase money note and mortgage on the Debtor's residence (the "Property"). The note has an outstanding balance of \$75,578.78 plus accruing interest along with reasonable attorney fees and for all costs of the action.
- 2. This response is to protect Creditor's rights regarding its proof of claim and Creditor reserves the right to supplement this response. Counsel for Ocwen Loan Servicing, LLC is currently researching the items raised in the Objection.

WHEREFORE, PREMISES CONSIDERED, Ocwen Loan Servicing, LLC prays this Court deny the Objection; and for such further relief as this Court deems appropriate.

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## OCWEN LOAN SERVICING, LLC,

By: <u>s/ Jim Timberlake</u>

JIM TIMBERLAKE - #14945

Baer Timberlake, P.C.

4200 Perimeter Center, Suite 100

Oklahoma City, OK 73102 Telephone: (405) 842-7722

Fax: (918) 491-5424 Attorney for Creditor

## **CERTIFICATE OF SERVICE**

I hereby certify that I mailed a true and correct copy of the above and foregoing Response with postage thereon fully prepaid to the parties listed below on October 9, 2015.

Darrin R Dunkin Pamela D Dunkin 2509 SW 81st Street Oklahoma City, OK 73159

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman P.O. Box 1948 Oklahoma City, OK 73101

Philip A. Hurtt 1525 SW 89th Oklahoma City, OK 73159

By: <u>s/ Jim Timberlake\_</u>

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